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ABSTRACT

Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex in student programs and in virtually every aspect of employment policy and practice in education institutions receiving Federal funds. The purposes of this booklet are to review briefly data and legislation relating to issues of equal employment opportunity in institutions of postsecondary education, and to provide some specific suggestions for personnel involved in the selection of professional employees in postsecondary institutions regarding strategies for ensuring greater equity in the selection process and compliance with Title IX. Contents include: (1) Federal prohibitions of discrimination in education employment--a summary; (2) the challenge: a review of data on employment in postsecondary education; (3) ensuring equity in postsecondary education employment (general considerations and steps in the selection process); and (4) additional resources. Lists and addresses of concerned Federal agencies are appended. (Author/MSE)

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SELECTING PROFESSIONALS IN HIGHER EDUCATION: A TITLE IX PERSPECTIVE

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
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Office of Education

SELECTING PROFESSIONALS IN HIGHER EDUCATION: A TITLE IX PERSPECTIVE

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Prepared under Contract 300-75-0256 for the Women's Program Staff,
U.S. Office of Education, Department of Health, Education, and Welfare

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Preface

This booklet was developed under Contract 300-75-0256 between the Resource Center on Sex Roles in Education and the Women's Program Staff, Office of Education, U.S. Department of Health, Education, and Welfare. It is one of a series of technical assistance materials developed to assist education agencies and institutions in ensuring compliance with Title IX of the Education Amendments of 1972.

The elimination of sex discrimination in the employment policies and practices of education institutions is one of the requirements of Title IX. This booklet will focus upon strategies for this elimination in postsecondary institutions. The Office of Women in Higher Education of the American Council on Education has worked since 1973 to increase women's equity in institutions of postsecondary education. The Resource Center is grateful to Emily Taylor and Donna Shavlik, both of the Office of Women in Higher Education, for their authorship of this publication.

The Resource Center also wishes to acknowledge the advice and assistance provided throughout the project by Joan Duval, Women's Program Staff of the U.S. Office of Education; Becky Schergens, Office of the Assistant Secretary for Education; Reginald Pearman, Office of Education; Sarita Schotta, National Institute of Education; Gwendolyn Gregory, Office for Civil Rights; and Rosa Wiener, Office for Civil Rights. Marguerite Follett, Women's Program Staff, provided guidance in the preparation of the manuscript for final production.

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Introduction

Title IX of the Education Amendments of 1972 is the most recent Federal legislative prohibition of discrimination in education employment. It prohibits discrimination on the basis of sex in student programs and in virtually every aspect of employment policy and practice in education institutions receiving Federal funds. With the issuance in June 1975 of the Regulation to implement Title IX, and the Regulation's requirement for institutional self-evaluation to ensure compliance, the employment policies and practices of postsecondary institutions are again under scrutiny.

Although the principle of equal employment opportunity has been a matter of express social policy and a legal requirement for a number of years, in higher education, as in many other sectors of our society, much work remains before this principle is reflected in reality. The purposes of this booklet are to review briefly data and legislation relating to issues of equal employment opportunity in institutions of postsecondary education, and to provide some specific suggestions for personnel involved in the selection of professional employees in postsecondary institutions regarding strategies for ensuring greater equity in the selection process and compliance with Title IX.

This booklet is organized according to the following sections:

I. Federal Prohibitions of Discrimination in Education Employment—A Summary

II. The Challenge: A Review of Data on Employment in Postsecondary Education

III. Ensuring Equity in Postsecondary Education Employment

- General Considerations on Fair Professional Employment Practices
- Steps in the Selection Process

IV. Additional Resources

It is important to note two considerations which are reflected in the booklet.

First, although Title IX prohibits discrimination only on the basis of sex, other Federal laws and an executive order (described in Section I) prohibit discrimination on the bases of race, national origin, and religion. Because of these prohibitions, and because the policies and procedures necessary to ensure equal employment opportunity for females and males are also those necessary to ensure opportunity for members of racial and ethnic minority groups, references to both groups will recur throughout the booklet.

Second, Title IX prohibits discrimination on the basis of sex against any employee or applicant, whether professional or nonprofessional. Because of the uniqueness of some of the considerations relating to professional employment in academia, however, this booklet will focus on the process of the selection of professional employees in postsecondary institutions. Institutions are, of course, required to ensure equality of employment opportunity in any position, and the principles described or reflected in Section III should also be applied to the selection of nonprofessional staff.

I. FEDERAL PROHIBITIONS OF DISCRIMINATION IN EDUCATION EMPLOYMENT—A SUMMARY

Four Federal antidiscrimination laws and a Federal executive order comprise the major antidiscrimination requirements which are relevant to education institutions and agencies. These laws, their respective regulations and guidelines, and the bodies of administrative and judicial precedents regarding their interpretation, define the principles of equal employment opportunity which must be observed in the selection of employees.

Title IX of the Education Amendments of 1972

Title IX prohibits discrimination on the basis of sex against students and employees of education agencies and institutions receiving Federal funds. The Title IX Regulation prohibits sex discrimination in employment policies and practices in the following areas:

- Access to employment, including:
  - —Recruitment policies and practices
  - —Advertising
  - —Application procedures
  - —Testing and interviewing practices
- Hiring and promotion, including:
  - —Selection practices
  - —Application of nepotism policies
  - —Demotion, layoff, termination
  - —Tenure
- Compensation, including:
  - —Wages and salaries
  - —Extra compensations
- Job assignments, including:
  - —Classification and position descriptions
  - —Lines of progression
  - —Seniority lists
  - —Assignment and placement
- Leaves of absence, including:
  - —Leaves for temporary disability
  - —Childbearing leave and related medical conditions
  - —Childrearing leave

- Fringe benefits, including:

  –Insurance plans
  –Retirement plans
  –Vacation time
  –Travel opportunities
  –Selection and support for training
  –Employer-sponsored programs

- Labor organization contracts or professional agreements

The Regulation covering Title IX requires education institutions to develop and publish grievance procedures for the handling of complaints of sex discrimination. This procedure may be used or complaints may be filed directly with:

• The Office for Civil Rights
U.S. Department of Health, Education, and Welfare
Washington, D.C. 20201

or

• a regional Office for Civil Rights
U.S. Department of Health, Education, and Welfare
(See Appendix A for addresses of regional offices.)

If an agency or institution is found by the Office for Civil Rights or the courts to have discriminated on the basis of sex, the agency or institution may be required to take remedial action to overcome the effects of such discrimination. Corrective action in such forms as reinstatement, back pay, and/or appropriate damages for affected employees may also be required. Affirmative action to overcome the effects of conditions which resulted in limited participation by persons of a particular sex may be undertaken by institutions or agencies in the absence of a finding of discrimination.

Title VII of the Civil Rights Act of 1964

Title VII of the Civil Rights Act prohibits discrimination in employment on the basis of race, color, religion, national origin, or sex. All institutions or agencies with fifteen or more employees–including State and local governments and labor organizations–are covered under the amended Act. Title VII prohibits discriminatory practices in all terms and conditions of employment, including:

- Recruitment, selection, assignment, transfer, layoff, discharge, and recall
- Opportunities for promotion
- Inservice training or development opportunities
- Wages and salaries
- Sick leave time and pay
- Vacation time and pay
- Overtime work and pay
- Medical, hospital, life, and accident insurance
- Retirement plans and benefits
- Other staff benefits

Complaints of employment practices which discriminate in violation of Title VII may be made to:

• **The Equal Employment Opportunity Commission**
2401 E Street, N.W.
Washington, D.C. 20037

or

• **a regional office of the Equal Employment Opportunity Commission**
(See Appendix B for addresses of regional offices.)

In instances where State or local fair employment practices laws provide procedures for the handling of complaints of discrimination, the complaint may be referred to the relevant state or local agency for a sixty-day period of time. If the complaint is not resolved at this level, the EEOC assumes responsibility for investigation and conciliation. If this fails, the EEOC, the U.S. Attorney General, or the complainant may file suit.

If an agency or institution is found by the EEOC or the courts to have discriminated on the basis of sex, race, national origin, or religion, the agency or institution may be required to take remedial action to overcome the effects of such discrimination. Corrective action in such forms as reinstatement, back pay, and/or appropriate damages for affected employees may also be required. Affirmative action to overcome the effects of conditions which resulted in limited participation by persons of a particular group may be undertaken by institutions or agencies in the absence of a finding of discrimination.

The Equal Pay Act of 1963

The Equal Pay Act prohibits sex discrimination in salaries and most fringe benefits. All employees of education institutions and agencies, including those in professional, executive, and administrative positions, are covered by the Equal Pay Act.

The Act provides that a man and a woman working for the same employer under similar conditions in jobs requiring substantially equivalent skills, effort, and responsibility must be paid equally even when job titles and assignments are not identical.

Employers are required to maintain specified records relevant to the determination of possible violations of the law. Complaints may be filed with:

• **Employment Standards Administration**
Wage and Hour Division
U.S. Department of Labor
Washington, D.C. 20210

or

• **a regional office of the Wage and Hour Division**
U.S. Department of Labor
(See Appendix C for addresses of regional offices.)

If the Department of Labor finds that an employer has discriminated on the basis of sex, it may order salary raises and back pay and it may assess interest.

Executive Order 11246 as amended by 11375

Executive Order 11246 prohibits employment discrimination on the basis of race, color, religion, national origin, or sex in institutions or agencies with Federal contracts of over $10,000. Relevant contracts include both contracts for direct services and "grants" which involve a benefit to the Federal government. Institutions or agencies covered under the Executive Order must observe nondiscriminatory practices in hiring, discharge, promotion, wages, benefits, training, and all other conditions of employment.

Those institutions or agencies with Federal contracts of $50,000 or more and 50 or more employees are required to develop written affirmative action plans to overcome actively the effects of past discrimination and to facilitate optimal utilization of qualified women and minorities throughout the work force. An affirmative action plan must contain a work force utilization analysis to identify those areas in which women and minorities are underutilized. a review of all employment policies and practices to identify and to eliminate any sources of discrimination, and a statement of numerical goals and timetables for the correction of any underutilization identified. Although the contract may involve only one unit within the institution, the affirmative action plan must cover all employees throughout the institution.

Enforcement of the Executive Order and related policy guidelines is the responsibility of the Office of Federal Contract Compliance Programs (OFCCP) of the U.S. Department of Labor. The OFCCP has designated HEW as the agency responsible for enforcement of the Order in affected education institutions and agencies. Complaint procedures are provided for the filing of charges of possible discrimination and noncompliance. Complaints should be filed with:

• The Office for Civil Rights
U.S. Department of Health, Education, and Welfare
Washington, D.C. 20201

or

• a regional Office for Civil Rights
U.S. Department of Health, Education, and Welfare

Title VII (Section 799A) and Title VIII (Section 845) of the Public Health Service Act

Titles VII and VIII of the Public Health Service Act state that institutions receiving Federal funds for their health personnel training programs may not discriminate on the basis of sex in admissions or in employment practices relating to employees working directly with applicants or students. Every institution receiving or benefiting from a grant, loan guarantee, or interest subsidy for its health personnel training programs or receiving a contract under Titles VII or VIII is covered.

Institutions are required to maintain specified records to determine whether violations have occurred. Procedures are provided for the filing of complaints of violations of Titles VII and VIII. Complaints should be filed with:

• The Office for Civil Rights
U.S. Department of Health, Education, and Welfare
Washington, D.C. 20201

or

• a regional Office for Civil Rights
U.S. Department of Health, Education, and Welfare

If an institution is found by the Office for Civil Rights to have discriminated on the basis of sex, the institution may be required to take remedial action to overcome the effects of such discrimination. Corrective action in such forms as reinstatement, back pay, and/or appropriate damages may also be required. Affirmative action to overcome the effects of conditions which resulted in limited participation by persons of a particular group may be undertaken by an institution in the absence of a finding of discrimination.

II. THE CHALLENGE: A REVIEW OF DATA ON EMPLOYMENT IN POSTSECONDARY EDUCATION

Equalization of opportunities for professional employees has a long way to go.

Despite the fact that many postsecondary institutions were covered under Title VII as early as 1964, others were covered by Executive Order 11246 in 1968, and virtually all have been covered by Title VII and the Equal Pay Act since 1972, much progress remains to be made. Although data regarding the employment of racial and ethnic minority group members in institutions of higher education remain largely unavailable, data regarding the employment of females in academia suggest that discrimination still exists in institutional employment policies and practices.

Numerous studies have documented the underutilization of women in higher education employment. The 1975-76 edition of *Nearly Keeping Up: Report of the Economic Status of the Profession,* published annually by the American Association of University Professors, is the most recent of these.[1] Data presented in the *Report* indicate that the total percentage of female faculty in the 1436 institutions sampled dropped from 22.5 percent in 1974-75 to 21.7 percent in 1975-76. The percentages of women faculty reported in each academic rank are as follows:

	1974-75 %	1975-76 %
Professor	10.1	9.1
Associate Professor	17.3	16.6
Assistant Professor	27.9	27.9
Instructor	48.0	49.3
Lecturer	41.4	41.2
All Ranks	22.5	21.7

The data included in the *Report* not only indicate a decrease in the percentage of women employed but also in the relative compensation of women faculty. The percentage difference between the average compensation of men and women faculty members of the same rank was 4.5 percent in 1974. In 1975-76, this percentage differential had increased to 5.2 percent.

The *Report* concludes, based on such data, that "little sign of progress" for women can be noted.

Further evidence of underutilization is provided in John A. Centra's study, *Women, Men and the Doctorate,*[2] which compares matched populations of male and female Ph.D.'s from the classes of 1950, 1960, and 1968 as to marital status, employment, publications, income, and attitudes. His findings indicate that of those employed in academic institutions, more men than women are employed at universities, while more women than men work at two- and four-year colleges. More women than men are teaching, while more men than women are in administration and management. Men have higher academic rank, and more men are presidents, deans, and department heads. In contrast, women with comparable years of experience are instructors, lecturers, and assistant professors, or hold research appointments without faculty status.

Centra's findings further indicate that income is the area of greatest difference between men and women with doctorates. Men's incomes vary from an average of $18,700 for those with 5 to 6

years of experience to $27,100 for those with 22 to 23 years of experience. For the same experience levels, women's average incomes are $16,400 and $21,800 respectively. Similar patterns exist in all disciplines, with the greatest disparity in the physical sciences, where the comparable figures are $17,800 to $29,100 for men and $14,700 to $21,300 for women.

Women are largely excluded from administrative positions in higher education. The American Council on Education's Office of Women in Higher Education completed its first report of the numbers of women college presidents in 1975.[3] A 1976 update of the report shows the percentage of women presidents to be about the same—5 percent. It should be noted that a large number of these women presidents head parochial women's colleges.

A 1975 study of women administrators published by the National Association of State Universities and Land Grant Colleges[4] indicated that of the 9,588 administrative officers of 91 of their 133 member institutions, 16.7 percent were women. More than half of the women administrators (51.5 percent) were in low-management positions, and an additional 21.9 percent held middle-management jobs.

There was, however, indication of improvement. Of the 69 institutions who participated both in this 1975 study and a similar 1973 survey, the number of women administrators had increased by 49 percent over the 2-year period. There were 967 female administrators at these institutions in 1975, as compared with 649 2 years earlier.

Recent efforts to remedy this inequality in higher education have had limited effect on the total picture. A 1973 study of the American Council on Education reported:

> . . .in spite of the presumed implementation of affirmative action programs in higher education, the proportion of blacks among teaching faculty has increased only slightly: from 2.2 percent in 1968 to 2.9 percent in 1972-73. For women on the faculty, there has been not so much an increase as a redistribution, with the proportions decreasing at two-year and four-year colleges and increasing slightly at universities.[5]

Data such as these underscore the necessity of conducting a selection process which is free of bias. The equitable employment of women and racial-ethnic minority group members throughout education institutions and systems will occur only if continuous and conscious efforts are made to recruit qualified individuals from all groups in our society, and to select the most competent candidate regardless of sex, race, or national origin. Such efforts will be discussed in the next section of this booklet.

III. ENSURING EQUITY IN POSTSECONDARY EDUCATION EMPLOYMENT

General Considerations on Fair Professional Employment Practices

Almost any professional worker found in the general population may be employed in the institution of higher education.

Institutions of higher education employ a wide variety of professional workers. By far the most numerous are members of the teaching and research faculties. In addition, there are always administrators and librarians, and, depending on the institution, there may be professional counselors, psychologists, psychiatrists, medical doctors, nurses, architects, lawyers, engineers, dieticians, accountants, geologists, ministers, business managers, public relations specialists, editors, veterinarians, radio and television producers, computer specialists, costume and scenery designers, and even pilots.

Neither higher education personnel nor government enforcement agents have had extensive experience in applying equal opportunity concepts to the selection of professional and executive employees.

Equal opportunity laws have, for many years, covered unskilled, semiskilled, and skilled workers, sales and clerical workers, and service employees. Although some education institutions were covered under Title VII as early as 1964, and those receiving $10,000 or more in Federal contracts have been subject to the nondiscrimination requirements of Executive Order 11246 since 1968, it was only in 1972 that professional and executive employees were covered under the Equal Pay Act and persons employed by State and local governments were covered under Title VII.

Modifying established employment practices in an effort to eliminate race and sex discrimination requires that all persons who are involved with employment in an education institution understand the laws, the reasons that led to their passage, and the requirements they impose for nondiscrimination in employment. Since higher education, far more than most other institutions, includes many people in the employee selection process, there is rarely a specific group of recruitment officers and interviewers who can be held accountable for exercising fair employment procedures. In some way and at some time, a high percentage of professional and administrative personnel may be involved in employee selection. All of these individuals need to be informed of and committed to the goals, purposes, and procedures of equal employment opportunity.

Methods for the selection of professional staff—research, administrative, or instructional—are not prescribed by law or regulation.

It is possible for an education institution to devise a variety of plans for filling professional vacancies. Equal opportunity laws, including Title IX, hold the institution responsible for fair consideration of all interested and qualified candidates, no matter what selection process is used.

A department or unit of an institution that is making progress toward full utilization and representation of women and racial-ethnic minorities and against which charges of improper selection procedures are not pending, might well be encouraged to continue whatever process it has developed for selecting new members. On the other hand, a department or unit that has demonstrated its inability to secure female and minority staff, even though the pool of qualified women

and minorities in that discipline is ample, would be well advised to review its procedures and make such changes as are needed to secure desirable results.

Federal regulations require that regardless of the selection process used, institutions keep whatever records may be necessary to demonstrate nondiscrimination in employment practices. Those persons with responsibility for the selection of employees should keep such records as necessary to document nondiscrimination at each step of whatever process is used.

The use of search committees does not necessarily assure fair treatment of candidates.

The use of search committees in the selection of employees in education institutions has become so common that such committees are believed by some to assure equal employment opportunity. There is, of course, no such assurance warranted. Search committees can be misused: their members can be appointed without regard to racial-ethnic and sexual representation on the committee, or members may be appointed to secure a particular outcome; they can be dominated by one or more of their members; and they can conduct their searches in innocence either of the meaning of equal opportunity or of the processes needed to provide it. Search committees that are properly constituted, informed, monitored, and held accountable for equal employment opportunity practices, however, can be both useful and effective. Individual administrators or faculty may also conduct the selection process fairly. Whether a committee or an individual is responsible for the selection of new staff, there are some principles and actions that must be understood and followed. These will be detailed as each step of the selection process is discussed.

Steps in the Selection Process

I. Preparation of Position Descriptions

Recommendation 1: Position descriptions should be carefully prepared and should include information about the following:

- **Nature of the institution**
- **Duties of the position**
- **Specific areas of responsibility**
- **Minimum qualifications and other desired attributes**
- **Particular expectations such as participation in campus or community activities; relationships with students, faculty, and staff**
- **Salary range**
- **Accompanying documents desired, such as curriculum vitae, names of references**
- **Name and address where applications should be sent and inquiries made**

Preparation of the position description is a crucial step in assuring equal opportunity in the employment process. The various aspects of the job to be done should be carefully detailed and the qualifications believed desirable for an incumbent should be listed. Cryptic position descriptions and general qualifications listed for job vacancies often bring in numerous inquiries, create additional work, and may be viewed skeptically as a method for meeting paper requirements for nondiscrimination. When the real job description and desired qualifications are shared only by word-of-mouth, women and minorities are often excluded, and the integrity of the entire selection process may be regarded with skepticism. Further, failure to specify job qualifications in writing has served to deny women and minorities information necessary to the planning of career development, information which is usually available to white males on a less formal basis.

The language used in the position description should be written so that it does not exclude women. The exclusive use of the pronoun "he" should be particularly avoided. There can be no qualifications demanded that are not job-related. To minimize steps in the selection process, the prepared statement can include a request for whatever documents are desired, such as biographical statements or curriculum vitae, names of references, or actual letters of recommendation. Requesting letters of recommendation at this stage may place an unnecessary burden on many people and should be avoided if possible.

Following is an example of a position description that offers succinct initial notification about the nature of the position:

VICE CHANCELLOR

Faculty and Staff Affairs

Responsible for overall management of an integrated personnel management program covering both faculty and support staff totaling more than 35,000 persons on 19 campuses. Position requires possession of a doctorate, or its equivalent in advanced study, or equivalent experience. Position also requires 1) at least ten years of experience in institutions of higher education; five of these years must have been at a high level of responsibility in planning, developing, implementing, and administering a broad and complex academic program including responsibility for personnel processes applicable to both faculty and support staff. OR 2) at least ten years of experience in personnel management; five of these years must have been at a high level of responsibility in planning, implementing and administering a broad and complex personnel management program which provides demonstrated evidence of a thorough understanding of and ability to administer both academic and support staff personnel processes.

This announcement is a restatement of a previous advertisement. Resumes must be received by May 28, 1976. Receipt will be acknowledged. Position will be located at new headquarters building in Long Beach. Please submit resume in confidence to the address indicated below.

Personnel Department, The California State University and Colleges, Office of the Chancellor, 5670 Wilshire Blvd., Suite 1070, Los Angeles, CA 90036. An Affirmative Action, Equal Opportunity Employer.

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Recommendation 2: The position description should be prepared by the individual or group ultimately responsible for the final selection.

Persons familiar with the position to be filled and those whose activities are directly affected by the incumbent's work should have an opportunity to express their opinions about both the job description and desirable qualifications. In cases where a search committee has been constituted, it is important for the committee to have a clear understanding of the nature of the position to be filled and the qualifications desired.

Recommendation 3: Consideration should be given to the expansion of traditional qualifications.

Previous experience in comparable positions is frequently cited in listings of position qualifications. However, women and minorities, who may have been denied access to comparable positions in the past, may possess similar skills or experience in related positions outside traditional settings, which should be considered in evaluating their qualifications. For example, women and minorities, who have rarely been represented in administrative positions in higher education, have often had experience in administrative positions in special interest organizations which could serve to qualify them. It is therefore desirable to describe qualifications in terms of skills required for job performance rather than in terms of past positions held.

II. Announcement of Position Vacancy

Recommendation 1: Promotion of qualified women and minority group members from within the institution is an important component in the provision of equal employment opportunity.

A legitimate complaint is that well-qualified women and minority group members continue to be overlooked when vacancies arise. If the pool of qualified people on campus includes women, men, and members of racial-ethnic minority groups, there is no legal or moral requirement that a nationwide search be made, provided all eligible persons on campus are made aware of the vacancy and permitted to apply. However, the institution may wish to expand its pool in the hope of finding better qualified candidates or of reassuring itself that it already has available for promotion persons who can compete in a national comparison.

Resentments and suspicions are aroused about the honesty of the search process if a national search is seen as a device for documenting nondiscrimination when an on-campus person has already been identified and has an inside track, especially one who has been groomed for the position. Such identification and preparation have not generally been available to women and members of racial-ethnic minority groups. The search process may also be seen as window-dressing when an outside candidate is believed to have been pre-selected.

Recommendation 2: All eligible persons on campus should be made aware of a position vacancy, whether or not it is determined that a national search be made.

Every eligible person on campus should be made aware of position vacancies, the availability of complete position descriptions, and the names of persons to contact for additional information. This may be done, for example, by developing a special weekly, biweekly, or monthly list of all position openings. Such a list might be coordinated through the equal employment opportunity office or the personnel office. Such a central listing might include the title of the position, a brief description, the minimum qualifications, the date the position is to begin, and the name of the person to contact for additional information. A central listing of position vacancies will make it easier for university personnel to know what openings exist. An internal, centralized mechanism for listing and posting or circulating announcements of position openings can be established very inexpensively to reach a large pool of individuals.

If the decision has been made to expand the search for candidates nationwide, timely notice of all vacancies, including an accurate position description, should be placed in a publication such as *The Chronicle of Higher Education,* "Bulletin Board" (1717 Massachusetts Avenue, N.W., Washington, D.C. 20036, (202) 667-3344). Notices of faculty vacancies should also be placed in the journals or newsletters read by most professionals in the discipline sought.

If universities begin to develop some consistency with regard to where vacancies are listed, it will be easier to inform all prospective applicants of where to look, thereby increasing the institution's chances of reaching a broad spectrum of candidates. The above publications are available to professional men and women of all races, religions, and national origins. Also, by using standard publications, advertising costs will be cut.

III. Recruiting: Reaching Adequate Numbers of Women and Racial-Ethnic Minority Group Applicants

Recommendation 1: To determine whether adequate numbers of qualified women and racial-ethnic minority group members are represented in the applicant pool for a particular position, their percentages in the pool should be compared with figures which indicate their availability in the particular job area for which applicants are being recruited.

One valuable source of such availability data is *Professional Women and Minorities—A Manpower Data Resource Service* by Betty M. Vetter and Elinor L. Babco (Scientific Manpower Commission, 1776 Massachusetts Avenue, N.W., Washington, D.C. 20036 (202) 223-6995).

This comprehensive study was first published by the Scientific Manpower Commission in 1975 for use by education institutions, industry, and government. This 320-page volume brings together for the first time virtually all available data on "manpower" at professional levels with special emphasis on women and minorities in the natural and social sciences, engineering, arts, humanities, education, and the professions. It is published in looseleaf format with appropriate subject divider tabs. This four-part reference book includes basic information on affirmative action; "manpower" data in all fields from more than 100 sources, such as the National Academy of Sciences, the National Center for Education Statistics, and the American Council on Education; recruitment sources; a bibliography; and a comprehensive cross index. Approximately 400 tables and charts with breakouts by sex and/or minority status provide data on enrollments; degrees; and on general, academic, and Federal work force participation by field and subfield. Each data resource section, arranged by field, is supplemented with textual highlights of the data and lists of specialized recruitment resources for women and minorities in that field.

A continuing subscription service provides semiannual updates and supplementary new data as they become available. The first 200-page supplement to *Professional Women and Minorities,* published in February 1976, includes updated information on enrollments, degrees, and work force participation in all fields, as well as an expanded section addressed to "manpower" data by sex and minority status in medicine and other health fields. Supplements are published in February and September of each year.

In institutions which have affirmative action plans, these plans provide another source of availability data which should be used in assessing the representativeness of the applicant pool, as well as numerical goals relevant to the position under consideration.

Recommendation 2: If the candidates who identify themselves are not representative of the percentages of women and minorities available with the desired qualifications, the recruitment process should, at this point, involve the seeking of nominations from individuals and groups most knowledgeable about those who are underrepresented.

Following are some sources that institutions may find helpful in locating women candidates.

1) **The Higher Education Referral Service (HERS)** provides suggestions of faculty and administrative candidates to colleges and universities expressing particular needs. There are presently two services, one located at Wellesley College in Massachusetts and the other at the University of Pennsylvania. The service located at the University of Pennsylvania concentrates primarily on administration but is also concerned with faculty appointments. These two services may be of assistance when institutions are trying to locate women candidates for serious consideration.

Director, Higher Education Referral Service, New England
Cheever House, 828 Washington Street
Wellesley College
Wellesley, Massachusetts 02181 (617) 863-2197

Director, Higher Education Referral Service, Mid-Atlantic
University of Pennsylvania
4025 Chestnut Street, T-7, Fourth Floor
Philadelphia, Pennsylvania 19174 (215) 243-5426

2) **The Office of Women in Higher Education of the American Council on Education** is concerned with strengthening leadership in postsecondary education by identifying and assisting women who have shown promise for major positions in academic administration, including deanships, vice presidencies, and presidencies. The office informally assists colleges and universities actively seeking women candidates for top-level administrative positions.

Office of Women in Higher Education
American Council on Education
One Dupont Circle
Washington, D.C. 20036 (202) 833-4692

3) **The Association of American Medical Colleges** is concerned with the advancement of women in medical education and provides assistance to medical schools in finding women candidates for positions.

Association of American Medical Colleges
Suite 200
One Dupont Circle
Washington, D.C. 20036 (202) 466-5100

4) **The Association of American Law Schools** periodically publishes *The Directory of Law Teachers.* This directory lists all persons currently teaching in American law schools and provides biographical information on each person.

Association of American Law Schools
Suite 370
One Dupont Circle
Washington, D.C. 20036 (202) 296-8851

5) **The American Association of University Women** publishes an annual listing of the various women's caucuses of professional associations. It is possible to obtain nominations of professional women from some of these caucuses.

American Association of University Women
2401 Virginia Avenue, N.W.
Washington, D.C. 20005 (202) 785-7700

6) The Project on the Status and Education of Women of the Association of American Colleges has recently published two resource papers on recruiting entitled "Recruiting Minority Women #2" and "Recruiting Aids #3—Rosters, Registries, and Directories of Women in the Professions." These listings contain valuable information which may be helpful in locating women, including minority women, candidates.

Project on the Status and Education of Women
Association of American Colleges
1818 R Street, N.W.
Washington, D.C. 20009 (202) 387-1300

7) Conferences and meetings of national associations and associations for various academic disciplines. National disciplinary and associational conferences provide many opportunities for individual faculty and administrators to become acquainted with women in these groups. These women, in turn, may be interested in changing positions or may know other women who would like to relocate. This dimension of recruitment has always been utilized by men, and efforts should definitely be made to include women in this informal network.

Recommendation 3: The names of potential candidates for a position should be placed in nomination only with the consent of the nominees.

This recommendation should provide the institution with candidates actually interested in the position while also preventing the institution from using a list of names merely to document its nondiscriminatory practices. Also, since public notices about the availability of a position tend to generate large numbers of candidates, it is important that committees or individuals responsible for the search procedures know that they are dealing with people who wish to be considered for the position. Unnecessary paperwork, which is costly and time-consuming, should be avoided.

IV. Initial Screening of Candidates

Recommendation 1: Special care should be taken during the initial screening of candidates to ensure that the screening is based only on appropriate job-related qualifications.

After the applications for the position to be filled are assembled, a paper cut will probably be required, especially if the position was advertised outside the institution. It is not uncommon for colleges and universities to report the receipt of hundreds of expressions of interest in a single position. The time and expense involved in bringing the candidates to the campus or elsewhere for interviews usually require that only those considered most qualified be selected for interviews.

Unexamined attitudes about qualifications needed by candidates for a position can lead to the elimination at the beginning of the selection process of candidates who do not exactly match preconceived ideas. It is probable that women are sometimes eliminated because the readers of curriculum vitae cannot visualize a woman in a position customarily held by a man; the opposite may very well also happen. No matter how the screening is done, a deliberate effort should be made to eliminate stereotypic ideas of appropriate professional roles for women and men or for members of various racial-ethnic minority groups. It is desirable to have the applications and supporting documents for members of the underrepresented sex or group read by more than one person or by multiethnic teams on which both sexes are represented. The purpose of this special care is not to dilute consideration of job-related qualifications but to assure that screening is not based on attitudes that mitigate against equal employment opportunity.

If the position requires administrative skills, those who are screening applicants should not overlook nontraditional or volunteer activities. Candidates who have served in major appointive or elected positions in voluntary associations or organizations have had valuable managerial experience. The possession of skills is far more important than where they were acquired.

Recommendation 2: If it is reasonably certain that a particular candidate is not qualified for a position and will not be seriously considered, that person should not be invited to the campus merely for the purpose of making the process "look good."

The practice of bringing marginally qualified women and minority members to the campus for interviews is unfair and expensive. It raises unwarranted expectations on the part of the applicant; in the long run, it may hurt the reputation of the particular institution; and it serves no useful purpose with regard to the goals of Title IX or of equal employment opportunity. Fairness lies in the proper assessment of qualifications.

V. Pre-Employment Inquiries

Recommendation: Only those questions which are likely to elicit information on an individual's qualifications for employment may be asked during an interview or in writing.

Title IX specifically prohibits the asking of questions related to the marital status of a candidate. In addition, other kinds of pre-employment inquiries are suspect because they have, in the past, been used to deny opportunity to some candidates. A useful purpose is served by eliciting evidence of a candidate's ability to perform the work outlined in the job description. Knowing the person's race, religion, marital status, number of children, and child care arrangements, for example, does not provide any knowledge of an individual's qualifications for employment.

(Title IX does not prohibit pre-employment inquiries as to the sex of an applicant *provided* that such inquiries are made of persons of both sexes and that the results of such inquiries are not used in a discriminatory fashion. Under Title VII, pre-employment inquiries regarding an applicant's race or sex made in good faith for a nondiscriminatory reason are permitted.)

VI. The Interview

Recommendation 1: Interviewers should take time to question themselves about their own biases prior to interviewing the first candidates.

Each individual with responsibility for the interview process should examine his or her own biases and stereotypes to determine how they affect the manner in which questions are posed and responses interpreted. Some of the questions which each interviewer should consider before talking with candidates include the following:

- Am I limited in any way by lack of professional experience in working with women and minorities or by the way I view women and minorities as professionals?
  - –What are these limitations?
  - –How can I prepare myself to view women and minorities in the interview process as individuals and not as members of a class?
  - –How can I become more comfortable working with women and minorities?
- What, if any, are the expectations I have about the professional and social obligations of the person to be interviewed?
- Are these obligations essential for the position incumbent?

Recommendation 2: Interviewers should not make distinctions among questions asked male and female candidates.

Many candidates, both successful and unsuccessful in attaining certain positions, have discovered that there is often a whole series of questions asked by search committees or individual interviewers which are uniquely asked of women. These questions generally center on how the woman is going to manage both her career and her personal life. Since these questions are rarely asked of a man, they indicate that interviewers assume that men are more responsible than women in managing their professional and personal lives. Clearly, this is not a fair assumption. Such questions are probably unintentionally biased, arising from stereotypical attitudes about traditional roles of faculty and administrative wives. It seems difficult for some interviewers to conceive of women in professional roles in colleges and universities. Therefore, special effort should be made on the part of interviewers to eliminate such biased questions.

Recommendation 3: Candidates should be provided with detailed information about the institution and the position prior to the interview.

Such information should include the following:

- Explicit position description
- Information about the institution, especially about the specific unit in which the position is located
- Potential salary range and all benefits
- Timetable for the recruitment and hiring process
- Contact person for questions and future correspondence
- Name(s) of persons to contact if the candidates feel they have been unfairly treated in any way

Recommendation 4: The actual questions asked of all candidates during an interview should provide the candidates with an opportunity to clarify their perceptions of the written position description and to discuss their concept of and approach to the responsibilities of the position.

The questions should provide the interviewers with the information they need to assess the qualifications of the candidates in relation to the written position description. They should also provide the candidates with an opportunity to express their views on both the position and what they could bring to it. Some sample questions which may be asked during the interview process are listed below. Naturally, these questions should be revised to reflect the particular concerns of the institution.

- What is your understanding of the major goals of this institution?
- Do you believe that these goals are appropriate? In what ways, if any, would you like to see the stated goals changed?
- How do you see the position for which you are a candidate contributing to or being part of the institution?
- How do you see your particular skills, experiences, and expertise in relation to the position?
- Do you have any special requirements which would have to be met if you were to become a serious candidate?
- What questions do you have about the institution, the community, or the expectations of various constituencies for the incumbent of this position?

VII. Selecting the Nominees

Recommendation: Differential criteria of competence should not be applied to male and female candidates or to majority and minority candidates.

It is not uncommon to read or hear that women or minorities who were not as well qualified as white male applicants were included on a final list of nominees to fulfill equal employment opportunity requirements. On the other hand, equally frequently mentioned is the belief that men are often chosen on the basis of their potential, whereas women and minorities are expected to have already proven records of competence. The truth of such allegations is too entwined in subjective judgments and anecdotal records to be readily discernible.

If there are candidates interviewed who are demonstrably better qualified than others for a particular position, those candidates have every right to nomination. However, if fair processes have been consistently used, all candidates interviewed will have the objective qualifications needed. Interviews are, of necessity, subjective. It is at this point that discrimination based on culturally conditioned responses is most likely to emerge.

Although it is easy to discuss the principle of selection of the best qualified candidate, it is much more difficult for reasonable people to agree on who this candidate is. If a committee is responsible for selecting the nominees, it is probably fairest to include on the list all those who qualify according to the requirements determined for the position. Ultimately, a decision must be made in favor of one person. Any affirmative action goals of the particular institution or division of the institution should be respected at this stage, since only qualified candidates are under consideration.

VIII. Notification to All Candidates that the Position Has Been Filled

Recommendation: Personal letters announcing the person selected to fill the vacant position should be sent to all candidates prior to the public announcement.

Some women interviewed for presidencies report that they heard nothing further from some institutions after they were interviewed until they read announcements of the newly appointed presidents in the newspapers. Although such neglect of candidates may be only an oversight, it discourages women and minorities from becoming candidates for important positions. Those interviewed may feel that the institution is protecting its equal employment opportunity image, not seriously considering them for the position.

IX. Making the Final Offer

Recommendation: The conditions of employment, including salary and all fringe benefits, must be based on the position offered—not on the sex, race, or national origin of the prospective incumbent.

Data from the National Center for Education Statistics[6] and the American Association of University Professors[7] show that in 1975-76 the salaries of women faculty still lag behind those of men. Unpublished data from a national survey conducted by the College and University Personnel Association[8] indicate that the salaries of women administrators also tend to be lower than those of men in the same positions. It is important that the salary, benefits, and employment conditions for new employees be free of sex and race bias. The Title IX Regulation clearly requires equalization of all conditions of employment. (Title VII guidelines require such equalization on the basis of race, national origin, and sex. The Equal Pay Act requires equalization both of salary and most fringe benefits on the basis of sex.) Salary should be based on the principle of equal pay for equal work and not upon how many people the incumbent must support. Benefits accruing to female spouses should accrue to male spouses. If a house is generally offered to college deans, it should, of course,

be offered to a female college dean. Opportunities for attending professional meetings and representing the institution should be available to women and men alike and without regard to race or national origin.

X. Public Announcement

Recommendation: The announcement of new staff or faculty should cover their past experience, accomplishments, and possibly comments about the new position, but there should be no descriptions that might suggest sex or race discrimination.

When the position is finally filled, a public announcement is generally sent to local newspapers and other newspapers and journals as deemed appropriate. When women are appointed to nontraditional positions, sex discrimination can still be evident in a public announcement. For instance, a recent announcement referred to the new dean of a college as a "bouncy, cute blond." It takes more than competence to overcome the image conjured up by such a description. Personal descriptions are of questionable taste in the announcement of any appointment.

Conclusion

Nearly 300,000 persons staff the professional positions of higher education institutions. If personnel are not selected and compensated for these positions on the basis of competence and qualifications rather than stereotyped conceptions of sexually, racially, or ethnically "appropriate" job roles, our institutions will be denied important resources for administration, research, testing, and scholarship.

Further, although we do not know the ultimate impact of sex- and race-stereotyped staffing in education institutions on student outcomes, there is research to suggest that it is a significant factor in student achievement. In a sample of women derived from three successive editions of *Who's Who of American Women,* there was a strong positive correlation between the number of women faculty on a campus and the number of women achievers graduating from that campus.[9] Women students on campuses where women are denied faculty positions as a result of sex discrimination are thus denied role models to support their academic success and ultimate achievement. Similarly, it is logical to assume that the educational achievement of members of racial and ethnic minority groups is also influenced by the lack of positive faculty role models.

Changing the employment opportunity structure of education institutions cannot be accomplished by a single individual or institution alone, but each of us must accept our share of responsibility for contributing to more equal opportunity as we individually and collectively participate in the selection and hiring of educational personnel.

Footnotes

[1] American Association of University Professors, *Nearly Keeping Up: Report on the Economic Status of the Profession, 1975-76* (Washington, D.C.: American Association of University Professors, 1976, prepublication copy).

[2] John A. Centra, *Women, Men and the Doctorate* (Princeton: Educational Testing Service, 1974).

[3] "Up–It's the Only Way to Go," *Comment* 9, Fall 1975 (Washington, D.C.: Office of Women in Higher Education, American Council on Education).

[4] "Women Administrators Increase by 49 Percent in Two Years," *For Your Information,* No. 201, 6 February 1976 (Washington, D.C.: National Association of State Universities and Land-Grant Colleges).

[5] Alan E. Bayer, *Teaching Faculty in Academe: 1972-73* (Washington: American Council of Education, 1973).

[6] U.S. Department of Health, Education, and Welfare, National Center for Education Statistics, forthcoming.

[7] American Association of University Professors, *Nearly Keeping Up: Report on the Economic Status of the Profession, 1975-1976.*

[8] College and University Personnel Association. Personal communication with the Association.

[9] Elizabeth Tidball, "Perspective on Academic Women and Affirmative Action," *Educational Record* (Spring 1973): 130-135.

IV. ADDITIONAL RESOURCES

Gappa, Judith M.; Jauquet, Ann M.; and Ragan, Barbara M. *Self-Evaluation Package.* Logan, Utah: Utah State University, Affirmative Action/Equal Opportunity Programs (Logan, Utah 84321), January 1976. 245 pp.

An institutional self-evaluation tool designed for use by institutions of higher education. It contains 16 packets for distribution to specific offices/individuals responsible for programs or activities covered by the Regulation. One of the packets addresses the personnel services office; it covers such items as recruitment, advertising, application forms, compensation, and job classification.

Kane, Roslyn D. *Sex Discrimination in Education: A Study of Employment Practices Affecting Professional Personnel.* Vol. I–*Study Report,* Vol. II–*Annotated Bibliography.* Washington, D.C.: U.S. Department of Health, Education, and Welfare, National Center for Education Statistics (1200 19th Street, N.W., Washington, D.C. 20208), April 1976. 319pp.

A report providing general background information on sex discrimination in academic employment. It reviews the current status of women employed in professional positions in education institutions, from preschool through the universities, to determine their relative employment status in comparison to men and to identify discriminatory employment practices which have limited women's opportunities. The report gives detailed coverage to the following general areas: women's presence in the profession; women's salaries; employment practices; women's patterns of life and work; and the legal framework of nondiscrimination.

National Association of College and University Business Officers. *Federal Regulations and the Employment Practices of Colleges and Universities: A Guide to the Interpretation of Federal Regulations Affecting Personnel Administration on Campus.* Washington, D.C.: National Association of College and Business Officers (One Dupont Circle, Suite 510, Washington, D.C. 20036), 1974.

A continuing resource tool designed to keep subscribers up-to-date on developments regarding Federal regulations which affect college and university employment practices. Statutes, government programs, and regulations dealing with personnel administration on campus are coded within tabbed issue sections: Affirmative Action, Age Discrimination, Collective Bargaining, Employee Benefits, Equal Employment Opportunity, Federal Contract Requirements, Occupational Safety and Health, Sex Discrimination, Taxation of Employees, Wage and Hour Provisions, and Wage and Salary Controls.

Taylor, Emily and Shavlik, Donna. *Institutional Self-Evaluation: The Title IX Requirement.* Washington, D.C.: American Council on Education, Office of Women in Higher Education (One Dupont Circle, Washington, D.C. 20036), October 1975. 43 pp.

A working paper dealing exclusively with those portions of the Title IX Regulation which touch upon institutional self-evaluation at the higher education level. Each area of coverage is first given in lay language, followed by a commentary and suggested procedures for self-evaluation. The employment section briefly reviews requirements for nondiscrimination in the recruitment procedures, compensation, job status, advertising, pre-employment inquiries, and sex as a bona fide occupational qualification.

Vetter, Betty M. and Babco, Eleanor L. *Professional Women and Minorities: A Manpower Resource Service.* Washington, D.C.: Scientific Manpower Commission (1776 Massachusetts Ave., N.W., Washington, D.C. 20036), May 1975. 656 pp.

A compilation of data indicating the participation and availability of women and/or minorities in those professional areas generally requiring formal education to at least the baccalaureate level.

Appendix A

Regional Offices for Civil Rights
U.S. Department of Health, Education, and Welfare

	Offices	States
Region I	RKO General Building Bullfinch Place Boston, Massachusetts 02114	Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont
Region II	26 Federal Plaza New York, New York 10007	New Jersey, New York, Puerto Rico, Virgin Islands
Region III	Gateway Building 36th and Market Streets Post Office Box 13716 Philadelphia, Pennsylvania 19104	Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia
Region IV	50 Seventh Street, N.E. Atlanta, Georgia 30323	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee
Region V	309 West Jackson Boulevard Chicago, Illinois 60606	Illinois, Indiana, Minnesota, Michigan, Ohio, Wisconsin
Region VI	1114 Commerce Street Dallas, Texas 75202	Arkansas, Louisiana, New Mexico, Oklahoma, Texas
Region VII	Federal Building 601 East 12th Street Kansas City, Missouri 64106	Iowa, Kansas, Missouri, Nebraska
Region VIII	Federal Building 1961 Stout Street Denver, Colorado 80202	Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming
Region IX	Phelan Building 760 Market Street San Francisco, California 94102	Arizona, California, Hawaii, Nevada
Region X	608 Arcade Building M/S 616 1321 Second Avenue Seattle, Washington 98101	Alaska, Idaho, Oregon, Washington

Appendix B

Regional Offices of the Equal Employment Opportunity Commission

Offices	States
Atlanta Regional Office Citizens Trust Building Suite 1150 75 Piedmont Avenue, N.E. Atlanta, Georgia 30303	Alabama, Canal Zone, Florida, Georgia, Kentucky, North Carolina, Mississippi, South Carolina, Tennessee
Chicago Regional Office 600 South Michigan Avenue, Room 611 Chicago, Illinois 60605	Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin
Dallas Regional Office 1100 Commerce Street, Room 54A Dallas, Texas 75202	Arkansas, Louisiana, New Mexico, Oklahoma, Texas
Kansas City Regional Office 601 East 12th Street, Room 113 Kansas City, Missouri 64106	Iowa, Kansas, Missouri, Nebraska
New York Regional Office 26 Federal Plaza, Room 4000 New York, New York 10007	Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Puerto Rico, Rhode Island, Vermont
Philadelphia Regional Office Jefferson Building 1015 Chestnut Street Philadelphia, Pennsylvania 19107	Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia
San Francisco Regional Office 300 Montgomery Street, Suite 740 San Francisco, California 94104	Alaska, Arizona, California, Colorado, Guam, Hawaii, Idaho, Montana, Nevada, North Dakota, Oregon, Samoa, South Dakota, Utah, Wake Island, Washington, Wyoming

Appendix C

Assistant Regional Administrators for Wage and Hour
U.S. Department of Labor

	Offices	States
Region I	William L. Smith Room 1612 C John F. Kennedy Building Boston, Massachusetts 02203	Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont
Region II	Leo Friedman 1515 Broadway, Room 3300 New York, New York 10036	New Jersey, New York, Puerto Rico, Virgin Islands
Region III	Joseph P. Cassidy 3535 Market Street, 15th Floor Philadelphia, Pennsylvania 19104	Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia
Region IV	Hugh B. Campbell 1371 Peachtree Street, N.E. Room 305 Atlanta, Georgia 30309	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee
Region V	Donald H. Haack/William Van Zanen 230 South Dearborn Street 8th Floor Chicago, Illinois 60604	Illinois, Indiana, Minnesota, Michigan, Ohio, Wisconsin
Region VI	Robert B. Snyder 555 Griffin Square Building Dallas, Texas 75202	Arkansas, Louisiana, New Mexico, Oklahoma, Texas
Region VII	Sydney Sample Federal Office Building 911 Walnut Street, Room 2000 Kansas City, Missouri 64106	Iowa, Kansas, Missouri, Nebraska
Region VIII	C. Lamar Johnson Federal Building 1961 Stout Street, Room 15412 Denver, Colorado 80202	Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming
Region IX	John M. Silver Federal Office Building 450 Golden Gate Avenue Room 10353 San Francisco, California 94102	Arizona, California, Hawaii, Nevada, Pacific Trust Territories
Region X	Loren E. Gilbert Federal Building 909 First Avenue, Room 4141 Seattle, Washington 98174	Alaska, Idaho, Oregon, Washington